

June 6, 2023

Michael S. Regan
Administrator
Environmental Protection Agency|
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Homeowners Insurance References in EPA Federal Register Notices

Administrator Regan:

The National Association of Mutual Insurance Companies (NAMIC) is the largest property/casualty insurance trade group with a diverse membership of more than 1,500 local, regional, and national member companies, including seven of the top ten property/casualty insurers in the United States. NAMIC members represent almost 70 percent of the homeowner's insurance market. Through our advocacy programs we promote public policy solutions that benefit NAMIC member companies and the policyholders they serve and foster greater understanding and recognition of the unique alignment of interests between management and policyholders of mutual companies.

Representing two thirds of the providers of America's homeowners' insurance, NAMIC is respectfully concerned with and reaching out about statements made by the Environmental Protection Agency regarding potential differential treatment of insurance policyholders or applicants. Specifically, the EPA, in submissions to the Federal Register, appears to assert that individuals within referenced Environmental Justice populations (defined as people of color and low-income populations in at least some EPA Federal Register notices) have less or limited access to homeowner insurance. Examples of such EPA publications follow:

- Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles on 05/05/2023,
- Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles-Phase 3 on 04/27/2023,
- Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards on 12/30/2021,
- Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards on 08/10/2021, and,

- Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review on 11/15/2021.

In its posted online EJ 2020 Glossary, the EPA [defines](#) “Environmental Justice” (EJ) as follows: “The fair treatment and meaningful involvement of all people regardless of race, color, culture, national origin, income, and educational levels with respect to the development, implementation, and enforcement of protective environmental laws, regulations, and policies.”

By presenting statements about homeowners’ insurance in the above referenced publications which feature discussions of Environmental Justice, the EPA seems to imply that potential insurance availability or affordability issues may be linked to EJ. Yet, the EPA does not offer specific references or “scientific assessments” on insurance coverage in such areas to support the implication that homeowner insurance is not being made available in some way based on race, color, culture, national origin.

Respectfully, NAMIC asks the EPA to refrain from such charges regarding homeowners’ insurance in its publications moving forward. NAMIC is greatly concerned that an agency of the federal government with minimal expertise in homeowners’ insurance would infer such morally repugnant allegations. The Administration’s requirement of a “whole of government” focus on climate and equity does not empower federal agencies to broadly impute blame, particularly in the absence of legal authority in an industry that is highly regulated at the state level.

The Information Quality Act passed through Section 515 of the [Consolidated Appropriations Act, 2001](#) requires that each federal agency disseminating information ensure and maximize the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by the agency, and to allow affected persons to seek and obtain correction of information disseminated by the agency.

If the EPA has rigorous scientific assessments to support these statements, NAMIC would greatly appreciate the EPA sharing that information with us. However, if the EPA does not have such scientific assessments, we would respectfully request that the EPA discontinue the inclusion of such statements in support of proposed rules of a federal regulatory agency.



Thank you for your consideration of this serious matter. I would be most happy to discuss any questions or comments you may have if you would like to contact me at tkarol@namic.org and look forward to providing more comments in the future.

Respectfully submitted,

Thomas Karol
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National Association of Mutual Insurance
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